

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,  
Plaintiff

v.

CIVIL CASE NO. 19-1930 (PAD)

FUNDS IN THE AMOUNT OF  
\$53,082,824.19.00 IN U.S. CURRENCY,  
CONTAINED IN THE FOLLOWING  
ACCOUNTS UNDER THE NAME OF  
BANCO SAN JUAN INTERNATIONAL:

a. xxx-x7689 – MERRILL LYNCH  
ADDRESS: #15 SECOND ST.,  
SUITE 210, GUAYNABO, PR 00968,  
UP TO \$10,000,000.00;

b. xxx-x7059 – MERRILL LYNCH  
ADDRESS: 225 LIBERTY ST., 41<sup>ST</sup>  
FL, NEW YORK, NY 10281, UP TO  
\$5,000,000.00; AND

c. FEDERAL RESERVE BANK  
OF NEW YORK ACCOUNT # xxxx-  
x228-6, UP TO \$38,082,824.19,

Defendant.

**UNITED STATES OF AMERICA’S MOTION TO RESTRICT**

TO THE HONORABLE COURT:

COMES NOW, the United States of America, by and through its undersigned attorneys, and files this motion to restrict *United States’ Response in Opposition to Claimant’s Motion to Lift Stay at Docket No. 18*, for the reasons more specifically set forth below:

In compliance with the requirements of this Court’s Standing Order No. 9, dated January 30, 2013, the United States respectfully requests that the Pleading be accepted by the Court for

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filing with the following level of restriction: *SELECTED PARTIES: Limiting viewing to the attorney filing the document, attorney for the Claimant and the Court.*

The United is filing the Pleading with the requested level of restriction, because the level of restriction requested is necessary to protect the confidentiality of information contained in a sealed case referenced by the claimant.

As more fully set forth in the Pleading, the protection of the information detailed therein, outweighs the presumption of public access.

WHEREFORE, the United States respectfully prays the Court accept and file the Pleading under the requested restriction level, and that an ORDER issue directing the Pleading to remain under such restriction level until further order by the Court.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which automatically sends copies to all appearing parties.

RESPECTFULLY REQUESTED.

In San Juan, Puerto Rico, this 27<sup>th</sup> day of November 2019.

W. STEPHEN MULDROW  
United States Attorney

*s/David O. Martorani-Dale*

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